

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

JANE DOE 1, individually, and on behalf of)	
all others similarly situated, JANE DOE 2,)	
individually, and on behalf of all others similarly)	<u>Case No.:</u>
similarly situated, JANE DOE 3, individually,)	1:23-cv-10301-AS
and on behalf of all other similarly situated,)	
JANE DOE 4, individually, and on behalf of all)	
others similarly situated, JANE DOE 5,)	
individually, and on behalf of all others similarly)	<i>PRO SE DEFENDANT</i>
situated, and JANE DOE 6, individually, and)	CARLTON DOWE'S
on behalf of all other similarly situated,)	MOTION FOR EXTENSION
)	OF TIME
PLAINTIFFS,)	
)	
v.)	
)	
GOVERNMENT OF THE UNITED STATES)	
VIRGIN ISLANDS, FIRST LADY CECILE)	
DE JONGH, GOVERNOR KENNETH MAPP,)	
SENATOR CELESTINO WHITE, ATTORNEY)	
GENERAL VINCENT FRAZER, GOVERNOR)	
JOHN DE JONGH, SENATOR CARLTON)	
DOWE, DELEGATE STACEY PLASKETT,)	
and JOHN DOES 1-100,)	
)	
DEFENDANTS.)	
)	

PRO SE DEFENDANT CARLTON DOWE'S
MOTION FOR EXTENSION OF TIME

COMES NOW Defendant Carlton Dowe ("Dowe"), *Pro Se*, and moves this Court for an extension of time to file an Answer or otherwise enter pleadings in this

Jane Doe 1, individually, and on behalf of all others similarly situated, et al. v. Government of the United States Virgin Islands, et al.

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matter pursuant to Federal Rule of Civil Procedure 6(b)(1)(A)¹. As grounds for this Motion and/or request, Dowe states as follows:

1. I was recently served with a copy of the Class Action Amended Complaint in this matter.
2. I am in the United States Virgin Islands and seeking a New York licensed attorney to represent me in the above-captioned matter.
3. I require additional time in which to procure representation, to wit: a New York licensed attorney.
4. My attorney on St. Thomas, U.S. Virgin Islands contacted counsel for the Plaintiffs and discussed my need for additional time to either file an Answer or otherwise respond in this matter. Counsel for the Plaintiffs does not object to my request for an extension of time, providing that it does not run afoul of the Court's deadlines.
5. This Motion is made in good faith and not made for the purpose of delay.

¹ Federal Rule of Civil Procedure 6(b) states:

Rule 6(b). Extending Time

- (1) *In General.* When an act may or must be done within a specified time, the court may, for good cause, extend the time:
 - (A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires; or
 - (B) on motion made after the time has expired if the party failed to act because of excusable neglect.
- (2) *Exceptions.* A Court must not extend the time to act under Rules 50(b) and (d), 52(b), 59(b), (d), and (e), and 60(b).

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WHEREFORE, Dowe respectfully requests a thirty (30) days extension of time to either file an Answer or otherwise respond in this matter.

DATED: February 7, 2024

Respectfully submitted,
s/Carlton Dowe, Pro Se Defendant
P.O. Box 1143
St. Thomas, VI 00804
Tel.: (340) 642-8388
Email: cdowe31@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing **Pro Se Defendant Carlton Dowe's Motion for Extension of Time** was emailed to the Court via Pro_Se_Filing@nysd.uscourts.gov.

s/Carlton Dowe, Pro Se Defendant

The docket does not reflect when Defendant was served so the Court is unsure when Defendant's response is currently due. Defendant should file a response no later than March 12, 2024.

The Clerk of Court is directed to terminate the motion at ECF No. 37.

SO ORDERED.



Arun Subramanian, U.S.D.J.
Date: February 7, 2024